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January 4, 2005

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Secretary
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Room TW-A325
Washington, D.C. 20554

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Federal Communications Commission
Office of Secretary

Re: MB Docket No. 04-233
Broadcast Localism
Reply Comments of NBC Telemundo License Co. - Corrected Copy

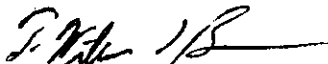
Dear Madam Secretary:

On behalf of NBC Telemundo License Co., ("NBC"), the following version of the attached reply comments corrects several minor errors in yesterday's submission.

Please substitute this submission in its entirety for that submitted yesterday.

Respectfully submitted,

NBC TELEMUNDO LICENSE CO.

By: 
F. William LeBeau
Its Assistant Secretary

Attachment

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**Before the
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JAN - 4 2005

Federal Communications Commission
Office of Secretary

In the Matter of

Broadcast Localism

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MB Docket No. 04-233

To: The Media Bureau

REPLY COMMENTS OF NBC TELEMUNDO LICENSE CO.

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
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To: The Media Bureau

REPLY COMMENTS OF NBC TELEMUNDO LICENSE CO.

Television stations advance the public interest by delivering quality video programming free to the consumer. But that is not enough to succeed in today's highly and increasingly competitive video marketplace where local stations must compete against hundreds of pay television networks. Local television stations cannot expect to grow without taking advantage of their knowledge of their community to better serve their local audiences. This is not a result of national government mandates; it cannot be. By definition, how a station may best embrace localism must be defined by every individual station, as every station's community has its own interests and issues. NBC Telemundo License Co. ("NBC") hereby submits these reply comments to further detail the ways local stations already serve their communities and to explain why, contrary to unsupported suggestions otherwise, straitjacketing central-government mandates will reduce television service that serves local interests.

Summary

NBC owns or controls 29 full power television stations, including 14 NBC Network affiliates, 14 Telemundo Network affiliates and one independent Spanish-

language outlet, in markets ranging from New York City to Birmingham to Tucson.

NBC's own experience demonstrates four fundamental truths regarding localism:

- A commitment to localism is a necessary attribute of a successful station.
- Television stations regularly and routinely serve localism in many ways without mandates.
- Cookie-cutter national mandates will diminish local television services.
- A station owner's location is irrelevant to that station's commitment to localism.

These principles underscore why individual stations, not national mandates, must determine how they will serve their communities – including the processes each station uses to determine how to deploy its limited resources to serve its local audience.

**A Commitment To Localism Is a Necessary Attribute of
a Successful Station**

Localism is not an aspiration of successful stations; it is a business necessity.

Television stations' local presence is a readily available and effective way to distinguish these stations from the hundreds of national cable networks that now are available to those U.S. households ready to pay for television. Even today, despite cable operators' growing take of local advertising revenues, cable systems and consumers alike continue to look to free, over the air television stations for programming that targets specific local demographics. Smart stations take advantage of their knowledge of their local communities to deliver such programming.

Local stations know this better than anyone. For example, the 14 owned and operated NBC affiliated stations average more than 30 hours per week of local news. Another compelling demonstration of this fundamental truth is the NBC Weather Plus Network. With the advent of digital broadcasting, free, over the air stations can deliver

multiple simultaneous programming choices to their communities from a single station. Dozens of NBC affiliates have seized this opportunity to deliver more local programming – in particular, local weather, traffic and emergency programming of the sort that is highly valued by consumers within a common national framework provided by the NBC Weather Plus Network.¹ Because of the enthusiastic response from NBC owned and operated stations and many NBC affiliates, all of whom want to deliver more, not less, local programming, the NBC Weather Plus Network expects soon to be in markets including 50 percent of the nation's television households, with more expected in coming months.²

For purposes of this proceeding, the critical element is that this new effort, which was introduced in multiple markets in November 2004 and has been in the planning stages for many months, is not a result of government mandates. It is a result of stations looking for a competitive edge, and recognizing that a specialized and differentiated local service -- when it serves a significant underserved or unserved audience -- is good business.

Television Stations' Commitment To Localism Takes Many Forms Without Mandates

To survive, television stations need viewers. Successful stations look to fill unserved or ill-served groups of viewers with cost-effective services. Accordingly, despite the high initial and fixed costs of news programming, which has little or no

¹ See, e.g., Notice at ¶ 27 ("A fundamental way in which broadcasters . . . serve their communities . . . is to provide emergency information.") The success of NBC Weather Plus likely will prompt others to develop similar local programming innovations in the digital space without government mandates.

² At this time, it is not clear whether many or most cable subscribers will receive this valuable service.

repeat value, many stations offer local news, albeit at differing times to attract different audiences. The result is that, according to recent studies, the average television station (based on a survey of news directors) airs roughly 21 hours per week of local news.³

But there are many other ways a station fosters its connection with its viewers. Some stations emphasize local sports; some, local community events and affairs; some, local politics. Some stations rely on non-programming means – through community outreach or charity efforts – to broaden their local appeal. Some stations, like our Telemundo stations, narrow their focus to a particular demographic that may not be well served by other stations. All of these efforts have a common purpose: to fill a real viewer need for as many viewers as possible. In today's world, where the free market, not central government mandates, enables stations to select their own means of attracting local audiences, struggling or new stations do not have to expend resources to compete against the entrenched news or other programming of their more established competitors; they have the freedom necessary to develop new cost-effective ways of serving their communities without outside interference.

NBC's owned and operated stations (the "NBC Stations") take advantage of their current freedom to look for innovative local programming or events to air. For example, the NBC Station in Providence, Rhode Island – the smallest NBC owned-and-operated ("O&O") station market – aired more than 42 hours of in-depth political coverage of the 2002 election (beyond daily news coverage) including five candidate debates and seven political roundtables. Meanwhile, NBC's O&O in Washington, DC, WRC-TV, has long

³ Average station data is based on the 2002 RTNDA/Ball State University News Director Survey (the "RTNDA Survey"), which is available at <http://www.stateofthenewsmedia.org> (Average Hours of Local TV News per Day).

been a leader in, among other matters, coverage of local sports, including the Redskins Report and the Joe Gibbs Show (as well as having the long-running local children's program – It's Academic). Other NBC Stations regularly offer local public affairs programming or community event programming in addition to their extensive local news programming. For example, KNBC(TV), Los Angeles, California, regularly airs multiple hours of public affairs programming, and NBC's New York flagship, WNBC(TV), routinely broadcasts several of New York City's most celebrated events, including The Bravest v. The Finest competition, the St. Patrick's Day Parade, the Puerto Rican Day Parade, the Columbus Day Parade, and the New York City Marathon.

In short, today's flexibility allows local stations to use their knowledge of their audiences to determine what programming best serves their public, and stations across the nation have responded by developing and broadcasting that programming.

Cookie-Cutter Federal Requirements Will Adversely Affect Television Stations' Overall Localism Efforts

Some advocates seem to believe that the federal government knows how a local station should serve its local market better than that local station itself.⁴ That stance is, at best, unsupported by real evidence, not to mention ironic. Frankly, it is impossible for the federal government – or any single centralized entity – to prescribe useful "localism" standards for the tens of thousands of communities served by thousands of television stations in hundreds of television markets from New York City to Rapid City.

⁴ See Comments of the Campaign Legal Center and Alliance for Better Campaigns, MB Docket No. 04-233, at 4-8.

Other advocates suggest that it is not enough to think of viewers as consumers.⁵ They suggest that it serves the public interest to have certain types of programs on the air, even if viewers (i.e., consumers) do not want to watch that programming. But an unwatched program, no matter how publicly beneficial in the abstract, is less than useless in that it precludes other quality programming from being on the air and adding to the public's real programming diversity.

NBC's own experience demonstrates that different markets cannot be served by any single set of one-size-fits-all requirements. For example, the needs of Miami's Spanish-language community, which is largely of Caribbean descent, are far different from those of Los Angeles's Spanish-language community, which is largely of Mexican descent. Similarly, what works in Chicago may not work in Birmingham.

It also is impossible to justify the costs of such cookie-cutter mandates. First, government mandates invariably diminish real programming diversity. For example, if all stations have to do news or some other form of local outreach, then – and entirely independent of First Amendment issues – weak stations will have to throw money away on news or other outreach that will be better delivered by larger stations with more resources. And that is money the weak station cannot use to develop a differentiated and innovative local service through which they can benefit an audience that is not being fully served by other stations.

Second, government mandates favor stronger stations. Government mandates cost money. Stations with more money are better able to spend the money needed to satisfy the requirements while still having sufficient funds to do what they think is best

⁵ See, e.g., Consumers Federation of America/Consumers Union, MB Docket No. 04-233 at 78-79

for their audiences. Stations that are barely viable are much less able to “spare” the funds needed to satisfy any government mandate. The result is less competition as weaker stations spend to satisfy the government, not to compete for more local viewers.

Third, government mandates cannot keep up with the realities of today’s ever-changing video marketplace. Consumers’ interests change month to month, not decade to decade. The market demands that stations adapt to serve those interests. In contrast, government mandates cannot hope to be sufficiently responsive to satisfy the changing demands of the public, which means that stations again will have to choose between satisfying their audiences or government mandates.

The NBC Weather Plus Network may be used to illustrate each of these three dangers of any government “localism” mandate. The Weather Plus Network unquestionably serves local consumers. But if the government were to mandate that all stations adopt similar programming, the result will be diminished service overall. First, stations would be forced to spend scarce resources on largely duplicative weather programming, reducing innovative programming available to consumers. Second, weak stations, unable to bear the costs of fully staffed local weather facilities, and unlikely to attract viewers to the programming that they can afford, would necessarily attract few viewers compared to stronger stations in a market. Third, Weather Plus affiliates are able to invest in the Network while knowing that, if it does not attract viewers initially, they can amend their mix of programming and their investments to better serve their public. That would not be the case if the programming were subject to specific government mandates.

A Station's Local Service Is Not Determined By Its Owner's Location, But By The Station's Available Resources And Its Commitment To The Public

NBC's headquarters are in New York. Its parent company is headquartered in Connecticut. But each NBC Station is managed and operated by persons who live and work in the Station's market, and who look constantly for new ways to serve their local audiences. That these Stations can take advantage of NBC's resources translates into better, not worse, local service. Indeed, the average owned-and-operated NBC affiliate delivers in excess of 30 hours of local news to their communities.

Evidence specific to the NBC Station Group underscores how group ownership can supplement a station's service to its local community. When a hurricane threatened Birmingham last year, the NBC Birmingham O&O benefited from personnel and equipment from several other NBC Stations, including personnel with expertise in hurricane and disaster coverage. The result was world-class coverage for a community that needed top-notch coverage in order to maximize public safety.

But the evidence is not limited to this single incident. The history of Telemundo and NBC demonstrate that distance from headquarters is irrelevant to a station's local commitment. In April 2002, General Electric Company ("GE"), NBC's ultimate parent, acquired Telemundo Network and its O&Os. GE then invested substantial human and financial resources to enhance Telemundo's news and informational programming efforts, including the addition of weekend local newscasts in multiple markets, including New York, Puerto Rico and Dallas. Telemundo O&Os that share markets with NBC O&Os also gained access to critical news equipment, including helicopters, news trucks and footage. The result has been a better Telemundo local news product. In Telemundo's first November sweeps as a unit of GE, Telemundo O&Os substantially

increased ratings in key markets. For example, in New York, Los Angeles and San Francisco, the ratings for Telemundo's 11 p.m. newscast witnessed triple-digit increases. Other markets witnessed substantial growth as well.⁶

Telemundo's local news product has not just grown in quality, but quantity. In acquiring Telemundo, GE created NBC/Telemundo same-market station groups in six markets. As of January 2004, NBC/Telemundo's 13 stations in these markets have witnessed a net increase of approximately 23.5 hours of regularly scheduled local news per week – an average increase of 1.8 hours per station in fewer than two years. For the Telemundo stations in these markets, the upgrade is even more pronounced: the seven Telemundo stations in these six markets have added 27.5 hours of weekly local news coverage as compared to November 2000, an average of 4.6 hours per station per week.

That pattern mimics GE's history with NBC. Historically, many stations now owned by NBC provided far less local news programming prior to GE's acquisition. GE acquired control of NBC in 1986. Since then, GE/NBC has acquired and continues to own 10 full-power NBC television stations. These 10 "recent" O&Os include WCAU(TV), Philadelphia, Pennsylvania, KXAS-TV, Fort Worth, Texas, and WVIT(TV), New Britain, Connecticut. With a single anomalous exception, each of these 10 stations has increased their local news output following their acquisition by GE. In total, these 10 stations have added 71.7 hours of local news programming per week, for an average increase in local news of 7.2 hours per station per week.

⁶ Valerie Block, *NBC's Telemundo Comes Up in the World*, CRAIN'S NEW YORK BUSINESS (December 13, 2002).

**The Experiences of NBC Stations Exemplify That Localism Is Best Served
by Free Market Competition Among Local Stations**

Decades of competition has taught NBC that localism is good business, and that the market not only will encourage stations to remain firmly rooted in their communities, but also will punish any station that ignores its community.

In order to further illustrate that point, nearly all of the 29 full-power NBC Stations have completed the attached surveys, which, while they do not attempt to offer a comprehensive catalog of any of the Stations' local efforts, demonstrate that stations already serve their local communities in myriad ways without intrusive and counterproductive government regulation.⁷

Beyond these surveys, NBC also has summarized – for the convenience of the Commission -- the local commitment of a few typical NBC Stations' at different stages of those stations' development. WRC-TV, NBC's O&O in the Washington, DC, market, exemplifies the service performed by a longstanding NBC Station. WNCN(TV), Goldsboro (Raleigh-Durham), North Carolina, is a good example of the local service of a station that was acquired by NBC several years ago. Finally, KSTS(TV), San Jose, California, demonstrates how more recently acquired stations – here, a Telemundo station – have strengthened their local service since gaining access to the resources of GE and NBC.

WRC-TV, Washington, DC

One example of the extensive local service of individual NBC Stations is that of the owned and operated Washington, DC NBC affiliate, WRC-TV. That Station's past performance meets or exceeds any reasonable Commission expectation:

⁷ See Appendix A.

- For several years, the Station has produced and aired roughly 40 hours of local news per week – or roughly one-quarter of its entire broadcast schedule.
- Beyond news, the Station produces and airs multiple hours of locally produced programming every week, including current programs such as *It's Academic*, the *Redskins Report* and the *Joe Gibbs Show*.
- The Station airs regular and repeated public service announcements, including many during prime time programming.
- The Station offers a quality slate of educational children's programming, including locally produced children's programming.
- The Station routinely supports and advances community events and organizations.
- The Station has implemented broad EEO and community outreach efforts.
- The Station has been an industry leader in accelerating the public's transition to digital television.
- The Station provides millions of viewers top-quality entertainment programming, as the Station consistently has been a top-rated television station in its home market.

First, week in and week out, the station delivers outstanding and comprehensive news programming to its community. The Station airs local weekday hourly newscasts at 5 a.m., 6 a.m., 10 a.m., 4 p.m., 5 p.m., 6 p.m. and a half-hour newscast at 11 p.m., as well as multiple weekend local newscasts. All together, the Station currently airs 39.5 hours of local news per week, which amounts to approximately 24 percent of the Station's total programming.⁸ This programming has resulted in numerous Capital Region Emmy Awards and Chesapeake AP Broadcasters Association awards, including Best Newscast in 2001. All of this local coverage is in addition to the national network news coverage that airs on the Station.

⁸ The Station had aired 40 hours per week of local news, but recently substituted an additional half-hour of weekly political coverage (*The Chris Matthews Show*) for a half-hour of local news on Sunday.

The Station's commitment to news extends to its personnel and other news resources. The Station has a news staff comprised of 117 personnel. The Station's facilities and resources likewise reflect the importance the Station places on quality local news coverage. These personnel and resources enable the Station to cover the full range of news that is important to its viewers -- from local community events, schools and crime to national political news.

The Station's commitment to local coverage is not limited to its local newscasts. The Station often has preempted regularly scheduled programming to cover breaking news. For example, the Station has preempted scheduled NBC network programming to offer special coverage of the conflicts in Afghanistan and Iraq, Homeland Security announcements, the 2002 Washington, DC, sniper attacks, the recent loss of Space Shuttle Challenger, and serious local weather events. In the days following September 11, 2001, the Station altered its regular schedule to provide extensive coverage of the local and national stories resulting from the terrorist attacks. Although beyond the Commission's jurisdiction, the Station's comprehensive web site has become a publicly accessible repository for much of this coverage, as well as a clearinghouse for further news and information. Lastly, in addition to local weather and security alerts, the Station is an active participant in the Amber Alert program in order to better alert the community in the instance of a child's abduction.

All of these efforts demonstrate the Station's commitment to serve its viewers. And the Station's viewers have responded. The Station's consistent excellence has caused the Station to lead the Washington, D.C. market in local news ratings for total

households at 6 a.m., 6 p.m. and 11 p.m. for nearly every ratings sweeps period since May 1999.

Second, the Station routinely delivers quality locally produced programming in addition to its nearly 40 hours of local news per week. The Station produces several hours of local weekly programming, which spans several genres. In sports, the Station produces the *George Michael Sports Machine* year-round and multiple shows covering specific teams during their seasons. In news, the Station hosts the NBC Network's weekly production of *Meet the Press* and produces its own local weekly public affairs program, *Viewpoint*. The Station even produces its own children's programming: *It's Academic*, a weekly high-school quiz show, has been a favorite on the Station for decades and is among the nation's longest-running syndicated programs.

Third, the Station delivers comprehensive political coverage. Locally, the Station's political coverage routinely addresses all jurisdictions within the Station's coverage area, including the District of Columbia, Virginia and Maryland. During the 2000 presidential election cycle, the Station delivered on NBC's pledge to devote 5 minutes of local news in each of the 30 days prior to the election to in-depth campaign coverage. In 2004, the Station, along with other NBC Stations, increased that commitment, airing at least five minutes of election coverage daily from Labor Day through the November 2004 elections. This coverage was in addition to that day's breaking political news, and it included candidate-centered discourse and in-depth segments covering the national and local candidates' policy positions.

The Station's commitment to comprehensive local coverage also includes outreach to specific communities within the Station's broad community. This year, for

example, the Station scheduled to air on October 3, 2004, an election special that is directed to Latino concerns. The Station also produces for a local Telemundo affiliate a Spanish language version of *Viewpoint*, *Linea Directa*, even though, unlike other Telemundo stations, GE has no ownership interest in that Telemundo affiliate.

The Station features national political coverage -- of particular interest in its home market -- in multiple weekly programs. During the most recent term, the Station has aired (and, as noted, hosted) the nation's leading Sunday morning news program, *Meet the Press*. It also airs the long-running *McLaughlin Group* and the increasingly popular *Chris Matthews Show*. The Station has broadcast key segments of the national political conventions in presidential election years and, along with NBC News coverage, has offered detailed coverage of the 2000 and 2002 elections. In both the 2000 and 2004 election cycles, the Station aired the three presidential debates and the sole vice-presidential debate.

Fourth, the Station has aired countless public service announcements. Since 2000, the Station has aired, on average, in excess of 3000 unsponsored local public service announcements annually. (The Station aired many additional sponsored public service announcements.)⁹ These local announcements frequently address local community events or topics, such as the NBC4 Health and Fitness Expo, AIDS Walk

⁹ During prime time, late night and children's block programming, the Station airs many additional PSAs as part of the NBC Network's celebrated "The More You Know" series, which features NBC Network stars discussing issues ranging from the V-Chip to prejudice to Internet safety to parental involvement in issues such as drug and alcohol. By way of example, Appendix B offers a list of topics and celebrities that were developed during this past year's "The More You Know" series. See http://www.nbc.com/footer/tmyk/pgv_psa_vchip.shtml. The 2003-04 television season was the 15th season for "The More You Know" series, which now has developed a substantial library of PSAs. (For example, this past year, a V-chip PSA, featuring Katie Couric, returned to the air to further parental awareness of this technology.)

Washington, the Walk to d'Feet ALS, America's Walk for Diabetes, and opening of the National Museum of the American Indian.

The Station also uses its community leadership role to launch extensive events or campaigns on issues of particular concern.¹⁰ For example, for the past 11 years, the Station has addressed local health concerns through its Health and Fitness Expo. The tenth anniversary of the Expo occasioned multiple statements of congratulations and thanks from many community leaders, including D.C. Congresswoman Eleanor Holmes Norton, D.C. Mayor Anthony Williams, Virginia Governor Mark Warner, and executives from Montgomery, Prince George's and Arlington Counties. It also has occasioned letters from viewers, including at least one that credits the Expo with saving his life. (The Station now has broadened this means of community service through initiation of its "Get Healthy 4 Life" campaign, which commenced in 2003.) Another example of the Station's community efforts includes its just-launched "Safe and Secure" campaign, which responds directly to the issues that terrorism presents to its community as well as more mundane dangers to the Station's viewers and their families.

Fifth, the Station offers a quality slate of educational children's programming, including locally produced children's programming. During the relevant period, NBC has focused its core programming efforts on older children (ages 9-16), who have outgrown the more common elementary-school educational programs. Currently, the NBC Network has partnered with Discovery Kids to broadcast a three-hour block of children's programming that challenges those between the ages of 9 and 14. Prior to this arrangement, the Teen NBC children's block served older children with educational

¹⁰ See <http://www.nbc4.com/nbc4/index.html>.

and informative programming. In addition to this NBC Network programming, the Station has produced and broadcast the award-winning local program *It's Academic*, which has been on the air for 41 years and is endorsed by the National Association of School Boards. More than 80 Washington-area high schools are represented on the program each year, including a "Super Bowl" final. The program motivates students, both those who watch the program and those who participate in it, to a higher level of academic achievement.

The Station also airs occasional special programs that are specifically designed for children. In response to the terrorist attacks on September 11, 2001, the Station presented a special program on the terrorist attacks on September 15, 2004, called "Asking, Listening, Healing." This three-hour special, geared to children 13-16 years old, addresses fears, concerns, and prejudices in light of the September 11 attacks on the World Trade Center. A panel of children from the New York tri-state area spoke with educators and psychologists about how the horrific events of September 11 affected them and how they coped with the images of destruction, the many deaths, and the fears for their safety. Children of the Islamic faith on the panel discussed how other Americans view them. On a lighter note, the Station also aired the Washington Informer Spelling Bee, as it has done for 21 of the event's 22 years. The event has been hosted by multiple Station personnel over the years. The most recent event included 28 students representing DC's public, chartered and non-public schools.

Beyond programming, the Station has multiple initiatives in support of children and educational efforts. For example, Bob Ryan, the Station's longtime chief meteorologist, runs the 4WINDS Network, which gives students at hundreds of schools

in the Washington area a hands-on introduction to meteorology, including using (and crediting) students' work during weathercasts. In addition, "Bob Ryan's Almanac and Guide for the Weatherwise" is published annually, with all profits going to area charities benefiting children.

Sixth, the Station routinely supports and advances dozens of community events and organizations. The Station regularly advances campaigns on issues of importance to its community. Appendix C includes a sampling of recent Station outreach, which details the Station's participation in events from January to September 2004.¹¹ The diversity and extent of these events underscores the Station's impact throughout all segments of its community. Other events that the Station has supported (and intends to continue to support), but which come later in the calendar year, include:

- with the Whitman Walker Clinic, the Washington AIDS Walk;
- with the University of the District of Columbia, the Walk for Literacy;
- with the American Diabetes Association, America's Walk for Diabetes;
- with the Boys and Girls Club of Greater Washington, the Washington International Horse Show;
- with the Salvation Army, the Season 4 Giving program (in conjunction with the Salvation Army Toy and Coat Drive).

As members of the Washington community, many of the Station's personnel also have become engaged in these and other community activities.

¹¹ See Appendix C. These examples focus on events in which the Station participated from January 2004 through September 2004, along with information as to the number of years the Station has participated in those events. The Station also has participated in other events in past years that have not been listed, although more information is available upon Commission request.

Nationally and locally, others have recognized the Station's outstanding efforts in these areas. For example, the Station has just been nominated for a 2003 National Emmy for community service for its "Get Healthy 4 Life" public service campaign. (Other of the Station's projects have resulted in similar successes: for example, the Season 4 Giving campaign resulted in the donation of 30,000 coats and toys for 7,000 children during last year's holiday season.) More local examples include the Station being recognized by the following community organizations: Whitman Walker Clinic, DC Childcare Corporation, the Greater Washington Urban League, Hoop Dreams, the MS Walk, the National Chapter of the American Red Cross, and the United Black Fund.

Seventh, the Station regularly engages in broad community and EEO outreach efforts. Beyond the efforts noted above, the Station often seeks input from the community as to the issues most important to the community. Quarterly, the Station's management meets with the Station's Community Advisory Board. The Board includes a diverse group of community leaders who meet with the Station to share their perspectives on issues and concerns that impact the Station's community. However, the Station also routinely gets input from the community in less formal ways. For example, the Station's general manager, Michael Jack, is a board member of the Greater Washington Urban League, the Greater Washington Board of Trade, the Boys and Girls Club of the Greater Washington Area, the Emma Bowen Foundation, the Greater Washington Sports Alliance and the DC Chamber of Commerce. Mr. Jack's presence on each of these boards, and the substantial additional participation of other Station personnel throughout the community, offer an excellent informal avenue for confirming what issues matter to the community.

The Station also has a long history of inclusiveness in hiring decisions. The Station's General Manager, who also is NBC Universal's Vice President of Diversity, has long participated in programs designed to broaden the diversity of Station personnel. For example, for the past three years, the Station has conducted a one-semester course that addresses what goes into a successful television station with Howard University, one of the nation's leading historically black universities. The Station likewise has implemented the restored Commission EEO requirements to include notices of job vacancies to a long list of community and national organizations, including America's Job Bank, Asian American Journalists Association, Broadcast Employment Services, D.C. Department of Employment Services, National Television Academy, Howard University, Montgomery Works, Medialine, National Association of Broadcasters, National Association of Hispanic Journalists, National Gay & Lesbian Journalists Association, Native American Journalists Association, St. Luke's House, Women Empowered Against Violence, Inc., and Women in Film & Video. These notices are in addition to other notices of potential employment opportunities with the Station, including a notice that airs (when vacancies exist) roughly 6 times per week, within or adjacent to one of the Station's local newscasts. Beyond all of these efforts, the Station has a thriving internship program and works in conjunction with the Emma Bowen Foundation for Minority Interests in Media scholarship/work-study program.

Eighth, and most important to hundreds of thousands of consumers, the Station has offered quality entertainment programming. For example, the Station's prime time lineup has been in the top-three in the market in total households for every ratings period since May 1999. That the Station provides such consistently attractive fare at no

cost to consumers despite ever-increasing competition in the local and national video programming markets is clear evidence of the strength of the Station and its commitment to its viewers.

WNCN(TV), Goldsboro, North Carolina

The recent ownership history of WNCN(TV), Goldsboro, North Carolina ("NBC17") demonstrates that distant ultimate ownership is no bar to a commitment to local service. The station used to be owned by a deservedly respected Southern broadcaster, Beasley Broadcasting Group, which owns multiple radio stations in the region. Yet, for several years under Beasley's ownership, NBC17 was a home shopping station with minimal local programming, no community outreach, and – not surprisingly – a minimal local audience. This low-cost programming strategy did not work, and eventually Beasley sold the station to Outlet Broadcasting, which almost immediately sold the station to NBC in 1996, which, at that time, had no reliable, full-fledged NBC affiliate in the market.

Since that acquisition by NBC, NBC17 has been transformed from a barely-watched home-shopping outlet to a strong local competitor, a key source of news, public affairs and entertainment programming, and a solid contributor to the social, political and religious life of the local community. During the past several years, NBC17's weekly local news output has increased nearly 60% – from a mere 17 hours to 27 hours. The station's news coverage has included countless local stories. Also, NBC17 has produced dozens of public service announcements at no charge to support organizations like Big Brother, Big Sister, Make a Wish and Easter Seals. Some recent community-oriented programs include:

- numerous half-hour programs for Easter Seals;
- an annual hour-long NAACP program titled "The NAACP Today";
- an annual Easter Morning Service live from downtown Raleigh in conjunction with downtown churches;
- a weekly public affairs programs entitled "At Issue"; and
- countless news specials such as the hour-long Sept. 11th live memorial service two days after that tragic event, broadcast from both Durham and Raleigh.

In addition, the residents of Raleigh-Durham now have consistent access to news, public affairs and entertainment programming from the nation's most successful top-4 network.

But NBC17's local service is not limited to programming. NBC17 is actively involved in community outreach, including:

- our recent two-day health and fitness fair at the Raleigh Convention Center which drew 22,000 people and delivered over 7,800 free health screenings and tests to young and old;
- four annual blood drives for the local Red Cross;
- our annual Bone Marrow Drive;
- the active participation of our employees on numerous boards and steering committees of organizations like The United Way, The Raleigh Chamber of Commerce, Alliance of AIDS Services, the American Cancer Society, Triangle Association of Black Journalists, March of Dimes, NAACP branches, Children's Literacy Board and many churches and religious organizations.

The success of NBC17 under NBC ownership follows directly from the station being able to combine NBC's extensive resources and expertise with an unwavering commitment by the station to remain highly responsive and committed to local concerns.

And this is not an unusual scenario. When NBC invests the tens or hundreds of millions of dollars necessary to acquire and operate a television station, it will not jeopardize that investment by airing programming that does not appeal to the local community. Indeed, because it wants to expand its local audience, NBC is able and willing to spend even more in order to produce the truly locally-oriented programming and to fund the community activities that are the hallmark of a successful television station.

KSTS(TV), San Jose, California

NBC's commitment to localism is not limited to its English-language stations. Telemundo and its owned and operated stations, including KSTS(TV), San Jose, California ("KSTS"), consider service to the local community to be essential to its business. But localism for a Telemundo station often is different from that for an NBC station. A Spanish-language station that wants to focus on issues that matter to its local audience may have to cover a news story about Mexico or El Salvador that would not make the national news. To Telemundo, local service also means addressing the fundamentals, such as a story about how to open a checking account or what immunizations are needed before a child can start school.

Although acquired by NBC less than 3 years ago, KSTS has established a proud record of community and local service. At the station level, Telemundo has strengthened its local newscasts at 6 p.m. and 11 p.m. every weekday. KSTS's news team has more resources, thanks to the ability to share the resources of sister station KNTV, the San Jose owned and operated NBC station. KSTS serves both the San Francisco and Monterey markets and, working with NBC's local news team, has been